

EXHIBIT C



GEORGE K. CHEBAT (034232)

George@EnaraLaw.com

ROSS P. MEYER (028473)

Ross@EnaraLaw.com

Enara Law PLLC

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Telephone: (602) 687-2010

Filings@EnaraLaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiff,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and wife;
Brian Colvin and Corrina Colvin, husband
and wife; John Simon and Jean Simon,
husband and wife; William Mcewen and
Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband and
wife; and Does 1 through 10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF SHELLY N.
WITGEN IN SUPPORT OF MOTION
TO DEEM PLAINTIFF'S
OPPOSITION TO DEFENDANTS
MOTION TO SUMMARY JUDGMENT
FOR PLAINTIFF'S LACK OF
STANDING (DOC. 63) TIMELY AND
RESPONSE TO MOTION TO STRIKE
(DOC. 65)**

I, Shelly N. Witgen, declare as follows:

2. I am the Senior Advanced Certified Paralegal and Firm Manager at Enara LLC (“Enara Law”).

4. At that time, Ms. Silva alerted the firm that the Represented Defendants had filed a Motion to Strike based on Mr. Dimitrov's Opposition being filed five (5) days past the deadline.

6. When the Motion to Strike and Reply was filed, Hannah Watts, Enara Law's Legal Assistant, saved the document to this matter's folder in preparation for the oral argument requested by Plaintiff in his Opposition.

8. I did not receive the Motion to Strike and Reply in the Firm's Slack docketing thread to calendar the deadline to response to the Motion to Strike.

